

FILED IN OFFICE
CLERK OF STATE COURT
HENRY COUNTY, GEORGIA
STSV2021000972
VAL
JUN 14, 2021 10:46 PM

IN THE STATE COURT OF HENRY COUNTY
STATE OF GEORGIA

Lynne M. Policaro
Lynne M. Policaro, Clerk of State Court
Henry County, Georgia

DANA MEAD-GOINS,

Plaintiff,

v.

QUIKTRIP CORPORATION,

Defendant.

CIVIL FILE NO. _____

ACTION FOR DAMAGES

JURY TRIAL DEMANDED

RULE 5.2 CERTIFICATE OF SERVICE

Pursuant to U.S.C.R. 5.2, this shall certify that I have this date served copies of

Plaintiff's First Request for Admissions to Defendant QuikTrip Corporation and Plaintiff's First and Continuing Interrogatories and Requests for Production of Documents to Defendant QuikTrip Corporation to Defendant QuikTrip Corporation to Defendant by personal service:

CT Corporation System
289 South Culver Street
Lawrenceville, GA 30046

This 14th day of June, 2021.

/s/ Candace Alynn Hill Duvernay
CANDACE ALYNN HILL DUVERNAY
Georgia Bar No. 849535
Attorney for Plaintiff

Hill Duvernay and Associates, LLC
110 Habersham Drive, Suite 102
Fayetteville, Georgia 30214

Lynne M. Policaro
Lynne M. Policaro, Clerk of State Court
Henry County, Georgia

— 1 —

CERTIFICATE OF SERVICE

This is to certify that I have this day served the following counsel of record with a true and correct copy of the foregoing pleading via electronic service and/or by depositing said copy in the United States Mail, with sufficient postage affixed thereon, and properly addressed to the following:

Candace Alynn Hill Duvernay, Esq.
Hill Duvernay and Associates, LLC.
110 Habersham Drive
Fayetteville, Georgia 30214

This 15th day of July, 2021.

DOWNEY & CLEVELAND, LLP

By: /s/ Sean L. Hynes
SEAN L. HYNES
Georgia State Bar No. 381698

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JUL 15, 2021 09:58 AM
Lynne M. Policaro
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Henry County, Georgia

IN THE STATE COURT OF HENRY COUNTY
STATE OF GEORGIA

DANA MEAD-GOINS,)	
)	
Plaintiff,)	
)	CIVIL ACTION
v.)	
)	FILE NO. STSV2021000972
QUIKTRIP CORPORATION, JOHN)	
DOE CORPORATION, and JOHN DOE)	
INDIVIDUAL,)	
)	
Defendants.)	
)	

RULE 5.2 CERTIFICATE OF SERVICE OF DISCOVERY

Pursuant to Uniform State Court Rule 5.2, the undersigned hereby certifies that on the date shown, Defendant QUIKTRIP CORPORATION, appearing specially and without submitting to the jurisdiction and venue of this Court, served copies of the following pleadings:

1. Defendant's First Continuing Interrogatories to Plaintiff;
2. Defendant's First Request for Production of Documents to Plaintiff;
3. Defendant's First Request for Admissions to Plaintiff; and
4. Defendant's Responses to Plaintiff's Request for Admissions.

by depositing same in the United States Mail, properly addressed and with sufficient postage affixed thereon, to the following counsel of record:

Candace Alynn Hill Duvernay, Esq.
Hill Duvernay and Associates, LLC.
110 Habersham Drive
Fayetteville, Georgia 30214

This 15th day of July, 2021.

Respectfully submitted,

DOWNEY & CLEVELAND, LLP

By: /s/ Sean L. Hynes
SEAN L. HYNES
Georgia State Bar No. 381698
hynes@downeycleveland.com
Attorneys for Defendant

Downey & Cleveland, LLP
288 Washington Avenue
Marietta, GA 30060-1979
T: 770-422-3233
F: 770-423-4199

CERTIFICATE OF SERVICE

This is to certify that I have this day served the following counsel of record with a true and correct copy of the foregoing pleading via electronic service and/or by depositing said copy in the United States Mail, with sufficient postage affixed thereon, and properly addressed to the following:

Candace Alynn Hill Duvernay, Esq.
Hill Duvernay and Associates, LLC.
110 Habersham Drive
Fayetteville, Georgia 30214

This 15th day of July, 2021.

DOWNEY & CLEVELAND, LLP

By: /s/ Sean L. Hynes
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Plaintiff,)	
)	CIVIL ACTION
v.)	
)	FILE NO. STSV2021000972
QUIKTRIP CORPORATION, JOHN)	
DOE CORPORATION, and JOHN DOE)	
INDIVIDUAL,)	
)	
Defendants.)	
)	

DEFENDANT'S NOTICE OF FILING ORIGINAL DISCOVERY

COMES NOW, Defendant QUIKTRIP CORPORATION, appearing specially and without submitting to the jurisdiction and venue of this Court, and files the following Original Discovery with the Clerk of Court:

1.

Defendant's Responses to Plaintiff's First Request for Admissions.

Respectfully submitted,

DOWNEY & CLEVELAND, LLP

By: /s/ Sean L. Hynes
SEAN L. HYNES
Georgia State Bar No. 381698
hynes@downeycleveland.com
Attorneys for Defendant

Downey & Cleveland, LLP
288 Washington Avenue
Marietta, GA 30060-1979
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Candace Alynn Hill Duvernay, Esq.
Hill Duvernay and Associates, LLC,
110 Habersham Drive
Fayetteville, Georgia 30214

This 15th day of July, 2021.

DOWNEY & CLEVELAND, LLP

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Plaintiff,)	
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DOE CORPORATION, and JOHN DOE)	
INDIVIDUAL,)	
)	
Defendants.)	
)	

DEFENDANT'S RESPONSES TO PLAINTIFF'S FIRST REQUEST FOR ADMISSIONS

COMES NOW, Defendant QUIKTRIP CORPORATION, appearing specially and without submitting to the jurisdiction and venue of this Court, and responds to Plaintiff's First Request for Admissions as follows:

GENERAL OBJECTION

Defendant objects to the Request for Admissions served by Plaintiff along with the Complaint on the grounds that it is inappropriate for Plaintiff to serve such request for admissions along with the complaint. See Perez v. Miami-Dade Cnty., 297 F.3d 1255, 1266 (11th Cir. 2002). It is too early for Defendant, having not yet received the allegations, to perceive what facts should or should not be contested. It is further inappropriate for Plaintiff to re-serve the complaint in the form of Request for Admissions in order to require Defendant to admit or deny nearly every paragraph of a Complaint that it has already answered." Id.

1.

Defendant admits the averments contained in paragraph 1 of Plaintiff's Request for Admissions.

2.

Defendant admits the averments contained in paragraph 2 of Plaintiff's Request for Admissions.

3.

Defendant denies the averments contained in paragraph 3 of Plaintiff's Request for Admissions.

4.

Upon information and belief, and after reasonable inquiry, the information known or readily obtainable by Defendant is insufficient to enable Defendant to admit or deny the averments contained in paragraph 4 of Plaintiff's Request for Admissions.

5.

Defendant denies the averments contained in paragraph 5 of Plaintiff's Request for Admissions.

6.

Defendant denies the averments contained in paragraph 6 of Plaintiff's Request for Admissions.

7.

Defendant denies the averments contained in paragraph 7 of Plaintiff's Request for Admissions.

8.

Defendant denies the averments contained in paragraph 8 of Plaintiff's Request for Admissions.

9.

Defendant denies the averments contained in paragraph 9 of Plaintiff's Request for Admissions.

10.

Defendant denies the averments contained in paragraph 10 of Plaintiff's Request for Admissions.

11.

Defendant denies the averments contained in paragraph 11 of Plaintiff's Request for Admissions.

12.

Defendant denies the averments contained in paragraph 12 of Plaintiff's Request for Admissions.

13.

Defendant denies the averments contained in paragraph 13 of Plaintiff's Request for Admissions.

14.

Defendant denies the averments contained in paragraph 14 of Plaintiff's Request for Admissions.

15.

Defendant denies the averments contained in paragraph 15 of Plaintiff's Request for Admissions.

16.

Defendant denies the averments contained in paragraph 16 of Plaintiff's Request for Admissions.

17.

Defendant admits the averments contained in paragraph 17 of Plaintiff's Request for Admissions.

18.

Defendant admits the averments contained in paragraph 18 of Plaintiff's Request for Admissions.

19.

Defendant denies the averments contained in paragraph 19 of Plaintiff's Request for Admissions.

20.

Defendant admits the averments contained in paragraph 20 of Plaintiff's Request for Admissions.

21.

Defendant denies the averments contained in paragraph 21 of Plaintiff's Request for Admissions.

22.

Defendant denies the averments contained in paragraph 22 of Plaintiff's Request for Admissions.

23,

Defendant admits the averments contained in paragraph 23 of Plaintiff's Request for Admissions.

Respectfully submitted,

DOWNEY & CLEVELAND, LLP

By: /s/ Sean L. Hynes
SEAN L. HYNES
Georgia State Bar No. 381698
hynes@downeycleveland.com
Attorneys for Defendant

Downey & Cleveland, LLP
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110 Habersham Drive
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This 15th day of July, 2021.

DOWNEY & CLEVELAND, LLP

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